



HOLMWOOD HOUSE  
SCHOOL

**PRIVACY NOTICE**

Children over age of 13

Reviewed: LS September 2022

## **Introduction**

This notice is to help you understand how and why we collect your personal information and what we do with that information. It also explains the decisions that you can make about your own information. We are giving you this notice because you are mature enough to make decisions about your personal information. If you have any questions about this notice please talk to your Head of Phase.

## **What is "personal information"?**

Personal information is information that the School holds about you and which identifies you.

This includes information such as your name, date of birth and address as well as things like exam results, medical details and behaviour records. The School may also record your religion or ethnic group. CCTV, photos and video recordings of you are also personal information.

## **How and why does the School collect and use personal information?**

We set out below examples of the different ways in which we use personal information and where this personal information comes from. The School's primary reason for using your personal information is to provide you with an education.

Admissions forms give us lots of personal information. We get information from you, your parents, your teachers and other pupils. Your old school also gives us information about you so that we can teach and care for you. Sometimes we get information from your doctors and other professionals where we need this to look after you. We collect this information to help the School run properly, safely and to let others know what we do here. Here are some examples:

- We need to tell the appropriate teachers if you are allergic to something or might need extra help with some tasks.
- We use CCTV to make sure the School site is safe. CCTV is not used in private areas such as changing rooms.
- We may need to report some of your information to the government. For example, we may need to tell the local authority that you attend the School or let them know if we have any concerns about your welfare.

- We may need information about any court orders or criminal matters which relate to you. This is so that we can safeguard your welfare and wellbeing and the other pupils at the School.
- If you are from another country we have to make sure that you have the right to study in the UK. We might have to provide information to UK Visas and Immigration who are part of the government.
- Depending on where you will go when you leave us we may need to provide your information to other schools, colleges and universities or potential employers. For example, we may share information about your exam results and provide references. We may need to pass on information which they need to look after you.
  - When you take public examinations (e.g. GCSEs) we will need to share information about you with examination boards. For example, if you require extra time in your exams.
  - We may need to share information with the police or our legal advisers if something goes wrong or to help with an inquiry. For example, if one of your classmates is injured at School or if there is a burglary.
  - Occasionally we may use consultants, experts and other advisors to assist the School in fulfilling its obligations and to help run the School properly. We might need to share your information with them if this is relevant to their work.
  - If you have misbehaved in a serious way, and the police have become involved, we may need to use information about the action taken by the police.
  - We may share some information with our insurance company to make sure that we have the insurance cover that we need.
  - We may share your academic and (where fair) your behaviour records with your parents or education guardian so they can support your schooling.
  - We may share information about you with other schools. For example, how well you have behaved at School and your test results.
  - We will only share your information with other people and organisations when we have a good reason to do so. In exceptional circumstances we may need to share it more widely than we would normally.
  - We will monitor your use of email, the internet and mobile electronic devices e.g. iPads. This is to check that you are not misbehaving when using this technology or putting yourself at risk of harm. If you would like more information about this you can read the ICT Acceptable Use policy or speak to Mr White.

- We may use photographs or videos of you for the School's website and social media sites or prospectus to show prospective pupils what we do here and to advertise the School. We may continue to use these photographs and videos after you have left the School.
- Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson.
- If you have concerns about us using photographs or videos of you please speak to the front office.
- We publish our public exam results, sports fixtures and other news on the website and put articles and photographs in the local news to tell people about what we have been doing.
- We may keep details of your address when you leave so we can send you information and find out how you are getting on.

If you have any concerns about any of the above, please speak to your Head of Phase.

### **Our legal grounds for using your information**

This section contains information about the legal basis that we are relying on when handling your information.

#### **Legitimate interests**

This means that the processing is necessary for legitimate interests except where the processing is unfair to you. The School relies on legitimate interests for most of the ways in which it uses your information.

Specifically, the School has a legitimate interest in:

- Providing you with an education.
- Safeguarding and promoting your welfare and the welfare of other children.
- Promoting the objects and interests of the School. This includes fundraising e.g. if we want to raise money to fund bursaries or new buildings.
- Facilitating the efficient operation of the School.
- Ensuring that all relevant legal obligations of the School are complied with.

In addition your personal information may be processed for the legitimate interests of others. For example, we may use information about you when investigating a complaint made by one of your fellow pupils. If you object to us using your information where we are relying on our legitimate interests as explained above please speak to your Head of Phase.

## **Legal obligation**

Where the School needs to use your information in order to comply with a legal obligation, for example to report a concern about your wellbeing to Children's Services. We may also have to disclose your information to third parties such as the courts, the local authority or the police where legally obliged to do so.

## **Vital interests**

For example, to prevent someone from being seriously harmed or killed. Public interest The School considers that it is acting in the public interest when providing education.

The School must also comply with an additional condition where it processes special categories of personal information.

These special categories include: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic information, biometric information, health information, and information about sex life or orientation. Substantial public interest The processing is necessary for reasons of substantial public interest.

Vital interests: To protect the vital interests of any person where that person cannot give consent, for example, if they are seriously hurt and are unconscious.

Legal claims: The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisors and insurers.

Medical purposes: This includes medical treatment and the management of healthcare services.

We may ask for your consent to use your information in certain ways.

If we ask for your consent to use your personal information you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid. Please speak to your Head of Phase if you would like to withdraw any consent given.

## **Sending information to other countries**

We may send your information to other countries where:

- we store information on computer servers based overseas; or
- we communicate with you or your parents when you are overseas (for example, during the summer holidays if you live in a different country).

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here:

[http://ec.europa.eu/justice/data-protection/internationaltransfers/adequacy/index\\_en.htm](http://ec.europa.eu/justice/data-protection/internationaltransfers/adequacy/index_en.htm)

If the country that we are sending your information to is not on the list or, is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland) then it might not have the same level of protection for personal information as there is in the UK.

### **For how long do we keep your information?**

We keep your information for as long as we need to in order to educate and look after you. We will keep some information after you have left the School, for example, so that we can find out what happened if you make a complaint.

In exceptional circumstances we may keep your information for a longer time than usual, but we would only do so if we had a good reason and only if we are allowed to do so under data protection law. We can keep information about you for a very long time or even indefinitely if we need this for historical, research or statistical purposes. For example, if we consider the information might be useful if someone wanted to write a book about the School.

### **What decisions can you make about your information?**

From May 2018 you will be able to make various decisions about your information. Some of these are new rights whilst others build on your existing rights. Your rights are as follows:

- if information is incorrect you can ask us to correct it;
- you can also ask what information we hold about you and be provided with a copy. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to;
- you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information;
- you can ask us to send you, or another organisation, certain types of information about you in a format that can be read by computer; and
- our use of information about you may be restricted in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy. Mrs Shiret can give you more information about your data protection rights.

## **Requesting access to your personal data**

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact Mrs Shiret.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

## **Further information and guidance**

This notice is to explain how we look after your personal information. Mrs Shiret can answer any questions which you might have.

Please speak to Mrs Dyson (Headteacher's PA) if:

- you object to us using your information for marketing purposes e.g. to send you information about school events. We will stop using your information for marketing purposes if you tell us not to; or
- you would like us to update the information we hold about you; or
- you would prefer that certain information is kept confidential.

Mrs Shiret is the person responsible at our School for managing how we look after personal information and deciding how it is shared. If you have any questions you can ask Mrs Shiret about how it works in our School. Alternatively, you can ask your parents to speak to us on your behalf if you prefer.

If you consider that we have not acted properly when using your personal information you can contact the Information Commissioner's Office: [ico.org.uk](https://ico.org.uk).